

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JUAN LOZADA-LEONI,

Plaintiff,

VS.

**MONEYGRAM INTERNATIONAL, INC.,
and MONEYGRAM PAYMENT
SYSTEMS, INC.,
Defendants.**

§ § § § § § § § § §

Civil Action No. 4:20-cv-68

**INTERVENOR KLG’S MOTION FOR LEAVE TO FILE ITS ORIGINAL COMPLAINT
FOR ATTORNEY’S FEES**

Intervenor KLG, by and through its counsel, hereby files this Motion for Leave to File Its Original Complaint for Attorney's Fees against Plaintiff Juan Lozada-Leoni pursuant to Federal Rule of Civil Procedure 3 and, in support thereof, states the following:

1. KLG represented Plaintiff in the above-captioned matter and provided legal services to Plaintiff from July 2016 to mid-April 2020.
2. Plaintiff has failed to pay for such services.
3. Based on Plaintiff's failure to pay for services rendered by KLG, KLG moves to file its Original Complaint alleging breach of contract and quantum meruit claims.
4. The proposed Original Complaint is attached hereto as "Exhibit A."
5. Rule 3 provides that a civil action is commenced by filing a complaint with the court.

INTERVENOR KLG'S MOTION FOR LEAVE TO FILE COMPLAINT FOR ATTORNEY'S FEES

6. The allegations contained in KLG's Original Complaint will not complicate the underlying litigation by excessive multiplication of the issues.
7. Further, the filing of the Original Complaint is essential to protect KLG's interest.
8. Accordingly, Intervenor KLG respectfully requests that the Court grant KLG leave to file its Original Complaint for Attorney's Fees.

Respectfully submitted,

/s/ Steve Kardell
Steve Kardell
Texas State Bar No.
11098400
E-mail:
skardell@kardelllawgroup.com
KARDELL LAW GROUP
4514 Cole Avenue, Suite
600
Dallas, Texas 75205
Telephone: (214) 616-4654
Facsimile: (469) 729-9926
ATTORNEY FOR INTERVENOR

CERTIFICATE OF CONFERENCE

During the week of 12/07/2020, I conferred by email with Susan Hutchison, counsel for Plaintiff, in the manner required under Local Rule 7(h) regarding the relief requested herein. Plaintiff is opposed to the relief requested herein.

/s/ Steve Kardell

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been submitted, by electronic means, to

all counsel of record on December 14, 2020.

/s/ Steve Kardell